> City of Wilmington Delaware

Helamare

LOUIS L. REDDING - CITY/COUNTY BUILDING 800 FRENCH STREET WILMINGTON, DELAWARE 19801 - 3537

Law Department (302) 576-2175

June 10, 2005

The Honorable Sue L. Robinson U.S. District Court for the District of Delaware 844 North King Street, Lock Box 31 Wilmington, DE 19801

RE: Knowlington Burbage v. City of Wilmington, et al.

C.A. No. 04-133 SLR

Dear Judge Robinson:

JAMES M. BAKER

On February 16, 2005, Defendants filed their First Set of Interrogatories and Request for Production of Documents directed to Plaintiff. Due to Plaintiff's failure to provide the outstanding discovery, Defendants filed a Motion to Compel which is currently pending before the Court. As of this date, Plaintiff has only provided a Response to the Request for Production. Plaintiff's response to Defendants First Set of Interrogatories is still outstanding.

The case dispositive motion deadline is June 15, 2005. In order for Defendants to properly brief this matter, it is essential that Defendants receive the information requested in the outstanding discovery. Therefore, Defendants respectfully request that the filing of case dispositive motions be stayed pending the Court's decision on Defendants' Motion to Compel, and a new briefing schedule be issued at that time.

I am available at the Court's convenience should Your Honor require anything further.

Respectfully submitted,

Rosamaria Tassone Assistant City Solicitor

cc: Knowlington Burbage